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**PRE-APPEAL BRIEF REQUEST FOR REVIEW**

Docket Number (Optional)

00100.01.0069

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Application Number

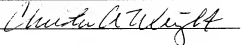
09/981,484

Filed

October 17, 2001

on August 7, 2006

Signature



First Named Inventor

Edward G. Callway

Typed or printed  
name Christine A. Wright

Art Unit

2671

Examiner

Joni Hsu

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reason(s) stated on the attached sheet(s).

Note: No more than five (5) pages may be provided.

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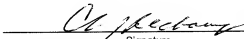
applicant/inventor.

☐

assignee of record of the entire interest.

See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed.  
(Form PTO/SB/96)☒

attorney or agent of record.

Registration number 34,414

Signature

Christopher J. Reckamp

Typed or printed name

312-609-7599

Telephone number

☐

attorney or agent acting under 37 CFR 1.34.

Registration number if acting under 37 CFR 1.34 \_\_\_\_\_

August 7, 2006

Date

NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required.  
Submit multiple forms if more than one signature is required, see below\*.☒\*Total of 1 forms are submitted.

This collection of information is required by 35 U.S.C. 132. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality is governed by 35 U.S.C. 122 and 37 CFR 1.11, 1.14 and 41.6. This collection is estimated to take 12 minutes to complete, including gathering, preparing, and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

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PATENT APPLICATION

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Edward G. Callway  
Serial No.: 09/981,484  
Filing Date: October 17, 2001  
Confirmation No.: 6461

Examiner: Joni Hsu  
Art Group: 2671  
Docket No.: 00100.01.0069

Title: **METHOD AND APPARATUS FOR RENDERING VIDEO**

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Mail Stop AF  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Certificate of Electronic Submission

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8706  
Date

Christine Wright  
Christine Wright

**REMARKS FOR PRE-APPEAL BRIEF REQUEST FOR REVIEW**

Dear Sir:

Applicant respectfully submits that the Examiner's rejections include clear errors because one or more limitations are not met by the cited reference and the reference does not teach what the Examiner alleges. Claim 20 would be allowable if written in independent form.

Remaining claims 1 and 18 stand rejected under 35 U.S.C. §102(b) as being anticipated by Normile. In order for a reference to anticipate a claim, each and every claim limitation must be set forth in the cited reference. In the Advisory Action and in the "Response to Amendment" section of the final action, the Examiner appears not to give meaning to wording in the claim such as the word "graphics" in the words "graphics device" set forth in claims 1 and 18, for example. Graphics devices such as video graphics adapters as noted in the Background of the Invention section of Applicant's Specification and elsewhere, perform at least graphic calculations (e.g., lighting operations, etc.) (see page 1, lines 13-22). Normile does not anticipate Applicant's claimed invention since Normile,

among other things, fails to describe a system that employs multiple graphics devices and output ports as claimed. The Normile device teaches multiple video compression and video decompression modules 401 and 402. No graphics devices have been cited in the office action and as such, the cited reference does not anticipate Applicant's claimed invention. In the Advisory Action, the Examiner alleges that the words "graphics device" and "video device" are taken to mean "the same thing". However, Applicant respectfully submits that the claimed graphics device at a minimum must perform graphics operations. The video compression and video decompression modules 401 and 402 of Normile do not perform such operations. Accordingly, Applicant respectfully requests withdrawal of the rejection.

In addition, the office action alleges that the display 440 of Normile is the claimed second video output port (see page 5 of office action). The claim also requires a first video output port. A display 440 is not a video output port since a display as known in the art is a display device. For this reason also, the Normile reference does not anticipate Applicant's claimed invention. Accordingly, Applicant respectfully requests withdrawal of the rejection.

Claims 30, 31, 38 and 39 stand rejected under 35 U.S.C. §102(b) as being anticipated by Taylor. Claim 30 requires, among other things, a first graphics device that renders a first frame of video, a second graphics device operative to render a second frame of video and a common port, operatively coupled to receive the first and second frames of rendered video from either of the first and second graphics devices. The Advisory Action and office action refer to column 5, line 65 to column 6, line 1 and column 6, lines 50-61; column 7, lines 11-30 alleging that the display controllers each render entire frames of video. However, the office action also admits that Taylor teaches to first output a sub-portion of a frame using one display control unit and then output another sub-portion of the frame via a different display control unit. Applicant respectfully submits that the cited portion of the reference such as columns 5 and 6 refer to using different frame buffers and controllers to output sub-portions

also referred to as “corresponding screen regions” of a single screen and hence, use sub-portions of a screen. As such, entire frame display for each graphics device as claimed is not taught in the cited reference. Therefore, the claims are in condition for allowance.

In addition, claim 39 requires that the first and second rendered frames are adjacent frames of video. However, the cited portion namely column 5, line 65 to column 6, line 1 and column 7, lines 11-30 do not describe adjacent frame control as required by the claim. As noted above, the cited portion refers to outputting based on display control task partitioning, corresponding screen sub-portions. Accordingly, Applicant respectfully submits that this claim is also in condition for allowance.

Claim 19 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Jordan in view of Gonsalves. In the “Response to Amendment” section of the final action, it is alleged that the HD44 pin cable of Jordan is the same as a “first output node” as claimed. However, other claim language appears to have not been considered in connection with the meaning of “first output node” of Applicant’s claim. For example, the claim requires that a value of a second signal at the first output node is adjusted to substantially match the determined value of the first signal at the first output node. The connector of Jordan is not an output node as claimed since the signals from the video monitor interface component 245 and 255 are not coupled to one another at a first output node and in fact the signals coming from the video monitor interface components 245 and 255 are routed in separate wires to two different monitors. Accordingly, Applicant respectfully requests that the rejection be withdrawn.

Although the rejection should be withdrawn for the above reasons, Applicant also respectfully submits that the cited references also do not teach adjusting the second device until a value of the second signal at the first output node substantially matches the determined

value of the signal of the first signal at the first output node as required and reserves the right to address this issue and others in an Appeal Brief if necessary.

Claim 21 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Jordan in view of Gonsalves further in view of Krenik. Claim 22 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Jordan in view of Gonsalves further in view of Davis. Claim 29 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Normile in view of Taylor. Claim 32 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Taylor in view of Wunner. Claims 33, 34, 36 and 37 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Taylor in view of Deering. Claim 35 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Taylor in view of Eichenberger. These dependent claims also add additional novel and non-obvious subject matter.

Since the references do not teach the claimed subject matter nor do they teach what is alleged in the office action, Applicant respectfully submits that the claims are in condition for allowance.

Reconsideration and withdrawal of the rejection of the claims is respectfully requested. A Notice of Allowance is also respectfully requested.

Respectfully submitted,

Date: August 7, 2006

By:   
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